

**GRAY ROBINSON**  
ATTORNEYS AT LAW

Brian H. Bieber  
Attorney At Law  
305-913-0546

BRIAN.BIEBER@GRAY-ROBINSON.COM

March 18, 2020

*VIA ECF*

The Honorable Vernon S. Broderick  
United States District Judge  
40 Foley Square  
New York, NY 10007

Re: U.S.A. v. Lorenzo, Francis, et al.  
Case No.: 15-Cr-00706 (VSB)

**APPLICATION GRANTED**  
**SO ORDERED** *Vern Bro*  
**VERNON S. BRODERICK**  
**U.S.D.J.** 5/7/2020

Honorable Judge Broderick:

The Government (through AUSA Daniel Richenthal) and Probation (through USPO Godwin Ogunmefun) have no objection to the following request. Defendant, Francis Lorenzo, requests this Court order that all passports of his and his family be released.

On October 6, 2015, Mr. Lorenzo was arrested in the above matter. On October 9, 2015, Mr. Lorenzo was released from custody on a \$2,000,000.00 Personal Recognizance Bond. As a condition of Mr. Lorenzo's pretrial release, he was required to surrender his passport to Pretrial Services. Mr. Lorenzo's mother, Elubardina Suero Lorenzo, brother, Andres Lorenzo, and two sisters, Deyanira Lorenzo and Ivelise Lorenzo, were also required to surrender their passports as a condition of Mr. Lorenzo's pretrial release. On March 27, 2018, this Court ordered the permanent release of Andres Lorenzo's passport. (Dkt. 744). On October 31, 2018, this Court ordered the permanent release of Elubardina Suero Lorenzo's and Deyanira Lorenzo's passport. (Dkt. 877).

On December 9, 2019, Mr. Lorenzo was sentenced to time served in the above matter. This Court also required that Mr. Lorenzo serve two (2) years supervised release. Prior to sentencing, Mr. Lorenzo spent approximately four (4) years under strict supervision pursuant to his pre-trial/sentence bail conditions. During that time, Mr. Lorenzo dutifully abided by all of his pre-trial/sentence bail conditions without any incident whatsoever. Because Mr. Lorenzo has now been sentenced and is currently on supervised release, his bond has been discharged. Although Mr. Lorenzo does not intend to travel internationally while on supervised release, he requests this Court order that all passports of his and his family be released.

333 S.E. 2ND AVENUE  
SUITE 3200  
MIAMI, FLORIDA 33131  
TEL 305-416-6880  
FAX 305-416-6887

BOCA RATON  
FORT LAUDERDALE  
FORT MYERS  
GAINESVILLE  
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Based on the foregoing, we respectfully request that Your Honor enter an Order releasing all passports surrendered in connection with Mr. Lorenzo's pretrial release conditions, and for such other and further relief as may be just and proper.

Respectfully submitted,



BRIAN H. BIEBER

BHB

cc: Janis Echenberg, AUSA (via e-mail only);  
Daniel Richenthal, AUSA (via e-mail only);  
Douglas Zolkind, AUSA (via e-mail only).